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BEFORE THE  
**FEDERAL COMMUNICATIONS COMMISSION**  
WASHINGTON, D.C.

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DEC 26 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Amendment of Section 73.202(b), )  
FM Table of Allotments, )  
FM Broadcast Stations, )  
(Fair Bluff, North Carolina, )  
Litchfield Beach, Johnsonville and )  
Olanta, South Carolina )

MM Docket No. 00-226  
RM-10001

To: Chief, Allocations Branch

**COMMENTS OF ATLANTIC BROADCASTING., INC.**

Gary S. Smithwick  
Henry E. Crawford

Smithwick & Belendiuk, P.C.  
5028 Wisconsin Avenue, N.W.  
Suite 301  
Washington, D.C. 20016  
(202) 363-4050

Counsel for  
Atlantic Broadcasting Co., Inc.

December 26, 2000

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## SUMMARY

Atlantic Broadcasting Co., Inc. ("Atlantic") submits its Comments in response to the *Notice of Proposed Rulemaking*, DA 00-2485, MM Docket No. 00-226, RM-10001 ("NPRM"), released by the Commission on November 3, 2000. In the NPRM, the Commission asked for additional information from the parties, and Atlantic hereby presents that information.

Based on the wealth of documents submitted by Atlantic in the course of this rulemaking, it is beyond question that Litchfield Beach, South Carolina is a community for purposes of amending the FM Table of Allotments. It has a substantial population, over 100 businesses, several local churches and a subjective sense among its residents that Litchfield Beach is a unique community with its own cultural, economic and political elements. Similarly, Olanta, South Carolina easily meets the criteria.

FM Station WPDT at Johnsonville, South Carolina can be removed from the community of Johnsonville and reassigned to Olanta, South Carolina without harming the public interest. WPDT has only operated on a sporadic basis at Johnsonville and Arbitron reports no audience for the station. Moreover, a new noncommercial FM station on Channel 204 can be assigned to Johnsonville and an existing noncommercial educational broadcaster has stated an intention to apply for that channel. Also, the population of Olanta presents a higher percentage of minorities than that of Johnsonville. The move to Olanta would, therefore, foster the expansion of FM service to minorities in accordance with the Commission's long-term goals and policies.

Based on its Comments, Atlantic requests that the allotment scheme proposed in the NPRM be adopted in full.

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Olanta, South Carolina	)	
To: Chief, Allocations Branch		

**COMMENTS OF ATLANTIC BROADCASTING CO., INC.**

Atlantic Broadcasting Co., Inc. ("Atlantic"), by counsel, in accordance with 47 CFR §§ 1.415 and 1.420 respectfully submits its *Comments* in response to the *Notice of Proposed Rulemaking*, DA 00-2485, MM Docket No. 00-226, RM-10001 ("NPRM"), released by the Commission on November 3, 2000.<sup>1</sup> In support thereof, the following is stated:

**I. INTRODUCTION**

Atlantic, permittee of WSIM(FM), Channel 287C3, Fair Bluff, North Carolina, and The Waccamaw Neck Broadcasting Company ("Waccamaw Neck"), licensee of WPDT(FM), Channel 286A, Johnsonville, South Carolina ("Petitioners") jointly filed a request to reallocate Channel 287C3 from Fair Bluff, North Carolina, to Litchfield Beach, South Carolina, to modify the authorization of WSIM to operate at Litchfield Beach as that community's first local aural transmission service, and to reallocate Channel 286A from

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<sup>1</sup> Initial comments are due on or before December 26, 2000, and reply comments are due on or before January 10, 2001, thus, these comments are timely filed.

Johnsonville to Olanta, South Carolina, as that community's first local transmission service and modify the license of WPDT to operate at Olanta. The NPRM proposed to make the requested reallocations. The NPRM raises three issues that are resolved herein: (1) Whether Litchfield Beach is a community for allotment purposes, (2) whether Olanta is a community for allotment purposes, and (3) whether sufficient public interest reasons exist to justify the removal of WPDT from Johnsonville and the reallocation of the station to Olanta.

## **II. ARGUMENT**

### **A. Litchfield Beach is a Community for Allotment Purposes**

Litchfield Beach is a seaside community located along Route 17 on the South Carolina coast. This community supports over 100 local businesses including restaurants, commercial plazas and a medical facility known as the Litchfield Medical Center.<sup>2</sup> The name "Litchfield" is clearly marked on all relevant highway signs leading in and out of the community.<sup>3</sup> Litchfield possesses several churches, community groups and associations. Litchfield has its own fire department located within the boundaries of the community. A simple Internet search using the Google.Com web site yielded over a dozen pages of hits involving businesses, groups and associations identified with Litchfield Beach.<sup>4</sup>

In the original joint petition ("Petition"), Atlantic submitted a substantial number of documents to demonstrate that Litchfield Beach meets the criteria established by the Commission for finding it to be a community for allotment purposes. Those documents

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<sup>2</sup> List of Litchfield businesses, Exhibit 1.

<sup>3</sup> Litchfield photographs, Exhibit 2.

<sup>4</sup> Web Pages, Exhibit 3.

showed Litchfield Beach to be an independent community with a substantial population, a defined center and a well-established commercial core. Declarations were submitted by a number of community residents, business owners and civic leaders who unequivocally stated their belief that Litchfield Beach is a community possessing its own unique cultural, civic and commercial identity.<sup>5</sup> In Declarations, residents like Henry J. Allen, Jr. stated their firm belief that Litchfield Beach is a distinct grouping of people with its own sense of unity and community involvement as expressed through Litchfield based educational, recreational, religious, business and residential facilities and services.<sup>6</sup>

Notwithstanding the wealth of information provided by Atlantic in the petition, the NPRM sought additional information stating:

Litchfield Beach is neither incorporated nor recognized by the U.S. Census, and even petitioner could not determine a definitive population count. In addition, Litchfield Beach has no governmental organizations or services, such as police or fire department....Therefore, petitioners are requested to provide further information to establish that Litchfield Beach and Olanta are communities for allotment purposes.

NPRM, p. 2, ¶ 6.

In response to the Commission's request, Atlantic is submitting a letter from the Georgetown County Administrator, Thomas W. Edwards, Jr.<sup>7</sup> The County Administrator explains that Litchfield Beach includes three Census tracts containing the following populations:

Tract	Population
9805003	1,421
9805005	1,760

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<sup>5</sup> Atlantic incorporates by reference all documents submitted along with the Petition.

<sup>6</sup> See generally, Petition, Exhibit 4.

<sup>7</sup> Exhibit 4.

9805006	640
<b>Totals:</b>	<b>3,821</b>

As noted in the NPRM, the County places the population of Litchfield Beach at approximately 3,800 persons while the State figure is approximately 2,200 persons. The County Administrator attributes the difference between the State and County figures to the different ways that these entities report second homes. The County considers these homes to be within the local population grouping because they are given 911 addresses. However, they are not counted in the State census records. The difference, therefore, is only a difference in the way that the population data is viewed by the counting entities. The fact remains that Litchfield has a substantial population and the Commission's concern over the discrepancy is of no material significance.

The County Administrator provides further information regarding Litchfield Beach:

- There are over 40 businesses in the commercial corridor;
- Litchfield Beach possess several community groups, one of which is actively promoting the incorporation of Litchfield Beach;
- Litchfield Beach is part of several political designated areas;
- Litchfield Beach has recently been given its own library system;
- Litchfield Beach will shortly have its own water-sewer facility and marina;
- Litchfield Beach is in the process of obtaining a new middle school;
- Litchfield Beach is served by three churches: St. Paul's Waccamaw United Methodist Church, St. Peters Lutheran and Christian Science practitioners;
- There are numerous local cultural events that celebrate life in Litchfield Beach. These include: Foster McKissick Memorial Golf Tournament; Carolina Couples Golf Tournament; Christmas Festival; Festival of Trees;
- There are many homeowners associates including the largest, Litchfield Beach Property Owners Association.

Exhibit 4. These observations by the County Administrator underscore and extend the information supplied in the declarations and documents submitted by Atlantic in the Petition.

Numerous Litchfield Beach businesses are listed in two local telephone books.<sup>8</sup> The community is marked on both the South Carolina Highway Map as well as the South Carolina Wildlife Facilities Atlas.<sup>9</sup> Litchfield has a community association that assesses funds from homeowners in order to provide a number of municipal services.<sup>10</sup> A local Rotary club meets in Litchfield on a regular basis. These indicia of community life portray a town with a rich and independent civic and cultural life. Taken as a whole, the documents submitted by Atlantic show Litchfield Beach to be an independent geographical grouping qualified to be a community for allotment purposes.

Recently in *Columbia City, Florida*, DA 00-2828, MM Docket No. 97-252, released December 15, 2000, the Allocations Branch followed the teachings of *Semora, North Carolina*, 5 FCC Rcd 934 (1990) and found Columbia City, Florida to be a community for allotment purposes. In *Columbia City*, the Allocations Branch noted that in *Semora* the community at issue was not listed in U.S. Census reports, had no local government and provided no municipal services except for a volunteer fire department.<sup>11</sup>

As in *Semora*, Litchfield Beach is not listed by the Census Bureau. However, Litchfield Beach has a population stated by the County Administrator to be

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<sup>8</sup> Exhibit 5.

<sup>9</sup> Exhibit 6.

<sup>10</sup> Exhibit 7.

<sup>11</sup> *Columbia City*, p. 3, ¶ 7.



approximately 3,800 persons. That is far greater than the 150 person found in *Semora*. In *Columbia City*, Census figures revealed a 1990 population of 1,911 persons and an estimated 1998 population of only 2,385<sup>12</sup>. Based on County figures, Litchfield Beach (3,821) is substantially larger than the estimated population of Columbia City (2,385). Even using the State figure of 2,213 persons for Litchfield Beach yields a community at least comparable to that upheld in *Columbia City*.

The *Columbia City* decision noted that *Semora* involved only one civic organization and two churches.<sup>13</sup> Here, Litchfield Beach possesses three churches and several community groups including a civic association that provides residents with valuable municipal services. There are numerous commercial complexes bearing the name "Litchfield". In terms of local services, according to the County Administrator, Litchfield Beach is in the processes of obtaining a local middle school, a water-sewer facility and a marina. As shown by the attached telephone book entries, Litchfield Beach contains a commercial business core with a number of local businesses that serve the Litchfield Beach community.

One of the most significant aspects of the *Columbia City* decision is the finding, as in *Semora*, of a subjective belief on the part of area residents that they actually reside in the community at issue.<sup>14</sup> This subjective evidence is traditionally submitted in the form of petitions or declarations of local area residents. As in *Columbia City* and *Semora*, in the present case, Atlantic has submitted several declarations of residents that

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<sup>12</sup> *Columbia City*, p. 4, ¶ 8.

<sup>13</sup> *Columbia City*, p. 3, ¶ 7.

<sup>14</sup> *Columbia City*, p. 4, ¶ 9.

clearly evidence the subjective belief or common perception that Litchfield Beach constitutes a distinct geographical population grouping. Therefore, Litchfield Beach is clearly a community for allotment purposes.

In sum, with the addition of the statement of the Georgetown County Administrator and the other materials supplied herein, Atlantic has demonstrated that Litchfield Beach meets the applicable criteria in terms of both objective and subjective criteria. In many ways, Litchfield Beach presents a more favorable factual situation than that of Semora or the more recent case of Columbia City. Therefore, in light of the evidence presented and the applicable precedent, Atlantic submits that Litchfield Beach should be treated as a community for purposes of amending the FM Table of Allotments.

**B. Olanta is a Community for Allotment Purposes**

In addition to the information requested by the Commission with respect to Litchfield, the NPRM also sought further information from the parties in connection with the community of Olanta, South Carolina. As stated in the NPRM:

Olanta is listed in the U.S. Census, but is not incorporated and also has no governmental organizations or services.

NPRM, p. 2, ¶ 6. This issue has been addressed thoroughly in the Comments filed by Waccamaw Neck Broadcasting Company. However, Atlantic submits that Olanta is an incorporated town chartered in 1908 with its own Mayor-Council form of government providing police, fire, water, sewer, garbage, schools, library and other public services.<sup>15</sup> Therefore, Olanta is clearly a community for purposes of amending the FM Table of Allotments.

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<sup>15</sup> Letter of Mayor Mel Thompson, dated December 18, 2000, Exhibit 8.

**C. The Public Interest Will be Served by the Removal of WPDT From Johnsonville, South Carolina, and its Reallotment to Olanta, South Carolina**

Petitioners propose the reallotment of Channel 287C3 from Fair Bluff, North Carolina, to Litchfield Beach, South Carolina, with concurrent modification of the authorization of WSIM to operate at Litchfield Beach. This can be accomplished in accordance with the Commission's rules and policies since WSIM has never been on the air, and AM station WNCR is licensed to Fair Bluff, North Carolina.<sup>16</sup> No issue is presented concerning the removal of the sole transmission service from Fair Bluff.

The reallotment of Channel 287C3 from Fair Bluff, to Litchfield Beach, is dependent on the removal of WPDT from Johnsonville, to Olanta, South Carolina. In the Petition, the Petitioners showed that WPDT, Johnsonville, South Carolina, had not broadcast a regular signal for a long period and should not be considered an operating station because the public has not come to rely on its signal.<sup>17</sup>

Inexplicably, the Commission stated:

We would consider WPDT to be an operating station based on the petitioner's showing, and as petitioners have also shown, the gain area is well served. Therefore, the only public interest benefit from the petition is the provision of a first local aural transmission service to Olanta. We note that the Commission has stated that it does not believe that the public interest is served by removing a community's sole local transmission service merely to provide a first local transmission service to another community.

NPRM, p. 3, ¶ 8 (emphasis added). The Commission requested additional information on any other public interest benefit that would justify a grant.

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<sup>16</sup> The Joint Petition for Rule Making filed September 26, 2000, noted at page 4 that AM Station WNCR, 1480 KHz, is licensed to Fair Bluff and will continue to provide that community with local radio broadcast service.

<sup>17</sup> The NPRM did not note that WNCR is licensed to Fair Bluff.

First, Atlantic respectfully disagrees with the Commission's initial finding that WPDT is an operating station. Such an interpretation is inconsistent with the facts. Waccamaw Neck has owned WPDT since 1996. On December 22, 2000, Waccamaw Neck filed a separate set of comments in this proceeding, and based on a review of those comments, it appears that in the third quarter of 1997, WPDT ceased providing any regular broadcast service to the residents of Johnsonville. WPDT has operated only sporadically to avoid forfeiture of its license under Section 312(g) of the Communications Act of 1934, as amended. It has not been able to provide a regular broadcast service to Johnsonville because the station could not attract enough advertising revenues to be viable. Arbitron reports that WPDT has not shown up in audience measurements taken in either 1996 or 1997.<sup>18</sup> Atlantic understands that Glory Communications, Inc., a corporation owned by an African-American broadcaster who currently owns 3 stations has offered to purchase WPDT. Glory wishes to operate WPDT from Olanta, South Carolina, which, Glory believes, will make WPDT a viable station.

Under these circumstances, Atlantic urges the Commission to find that Johnsonville does not have a local transmission service and that initiation of a first local transmission service to the larger community of Olanta by an African-American broadcaster provides ample public interest benefits to justify the grant of the proposal. The Commission cites *Ardmore, Oklahoma and Sherman, Texas*, 6 FCC Rcd 7006 (1991), a television case in the NPRM. It should be noted that in the Report and Order in *Ardmore, Oklahoma and Sherman, Texas*, 7 FCC Rcd 4846 (1992), the Commission did, in fact, remove the only service from Ardmore, Oklahoma, and reallocate it to Sherman,

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<sup>18</sup> Arbitron Letter, Chris Meinhardt, Exhibit 9.

Texas, in part, because it would provide the more populous community of Sherman with its first local transmission service. There were other extenuating factors different from the case at bar, but the controlling principles are the same; i.e., that in “rare circumstances” the Commission will waive the ban on the removal of the sole local broadcast service from a community. Here, the fact that WPDT has not provided a regular broadcast service since 1997 coupled with the provision of first local service to a larger community provide the “rare circumstances” needed to justify the waiver. In *Llano and Marble Falls, Texas*, 10 FCC Rcd 4913 (1995), also cited in the NPRM, the Commission proposed to remove the only local transmission service from Llano, Texas, and reallocate it to Marble Falls, Texas. The Commission, as here, asked for additional public interest justification for the action. In *Llano and Marble Falls, Texas*, 12 FCC Rcd 6809, the Commission made the requested reallocation because the reallocation would result in service to a larger community and would serve greater population. The Commission noted that it was allocating a new channel to Llano so that there would be two communities receiving first local service as a result of the Commission’s action. That is the case here. If the Commission reallocates Channel 286A from Johnsonville to Olanta, South Carolina, it can reallocate Channel 287C3 from Fair Bluff, North Carolina, to Litchfield Beach, South Carolina. Both would be first local transmission services.

Additionally, Atlantic has determined that an application may be filed for a construction permit for a new noncommercial educational FM station on Channel 204 at Johnsonville, South Carolina.<sup>19</sup> Toccoa Falls College, an existing noncommercial educational broadcaster, has stated an intention to apply for a construction permit on the

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<sup>19</sup> Engineering Statement, Exhibit 10.

channel. Unfortunately, because of the freeze imposed in *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, 15 FCC Rcd 7386 (2000), no application can be filed at this time. The Commission has entertained proposals to remove the sole transmission service from a community when an application for noncommercial educational station to replace local service was pending. See, *Everglades City, LaBelle and Estero, Florida*, 15 FCC Rcd 9427 (Allocations Branch, 2000). Therefore, local service would eventually come to Johnsonville, South Carolina. In light of the clear public interest benefits shown herein, the Commission should waive its prohibition on the removal of Channel 298A at Johnsonville, and reallocate the channel to Olanta, South Carolina.

Demographically, Olanta presents a superior allotment in terms of serving minority listeners. According to US Census figures, Johnsonville shows a population of 1,415 with a minority population of only 9%. On the other hand, Olanta has a total population of 687 persons with 174 persons identified as minority, representing 34% of the total population.<sup>20</sup> That population is presently undergoing an intense expansion due to a nearby Honda plant that has caused rapid growth in the area.

**D. Continued Expression of Interest**

Atlantic states that, if the Commission reallocates FM Channel 287C3 from Fair Bluff, North Carolina, to Litchfield Beach, South Carolina, and modifies the authorization of WSIM for operation at Litchfield Beach, Atlantic will, within the time afforded the Commission's order allotting the channel, file an application for minor

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<sup>20</sup> Census Reports, Exhibit 11.

change construction permit to operate WSIM at Litchfield Beach, and upon grant thereof, will construct and operate the facilities for WSIM at Litchfield Beach.

### **III. CONCLUSION**

Both objective and subjective evidence shows Litchfield Beach and Olanta to be communities for purposes of amending the FM Table of Allotments. Moreover, Atlantic has clearly demonstrated that the public interest will be served by the removal of WPDT from Johnsonville, South Carolina, and its reallocation to Olanta, South Carolina. Therefore, Atlantic submits that the allotment framework advanced in the Petition be accepted by the Commission.

**WHEREFORE**, Atlantic Broadcasting Co., Inc. respectfully requests that the Commission make the requested channel changes and modify the authorizations of WSIM and WPDT as follows:

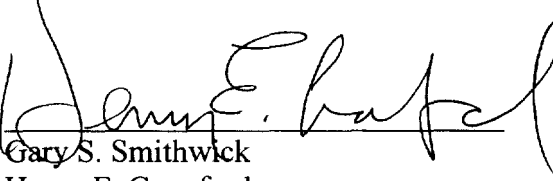
	<u>Table of Allotments</u>	
	<u>Present</u>	<u>Proposed</u>
North Carolina		
Fair Bluff	287C3	----- <sup>21</sup>
South Carolina		
Johnsonville	286A	-----
Litchfield Beach	---	287C3
Olanta	---	286A

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<sup>21</sup> AM Station WNCR (Facility ID No. 2860) is licensed to Fair Bluff, North Carolina.

Respectfully Submitted,

**ATLANTIC BROADCASTING CO. INC.**

By:   
Gary S. Smithwick  
Henry E. Crawford  
Its Attorneys

Smithwick & Belendiuk, P.C.  
5028 Wisconsin Avenue, N.W.  
Suite 301  
Washington, D.C. 20016  
(202) 363-4050

December 26, 2000



# **EXHIBIT 1**

## **Businesses**

**LITCHFIELD PLANTATION**

**LITCHFIELD COMPANY REAL ESTATE**

**SOUTH COVE CONDOMINIUMS**

**HOLY CROSS FAITH MEMORIAL CHURCH**

**FIRST FEDERAL OF CHARLESTON**

**THE PANTRY STORE**

**LITCHFIELD LANDSCAPING**

**LITCHFIELD MAINTENANCE, INC.**

**CHAPMAN CONSTRUCTION**

**HAMILTON ELECTRIC & PLUMBING**

**ST. ELIZABETH PLACE RETIREMENT**

**RUTH REALTY**

**MARCO ASSOCIATES, INC.**

**W.C.H. INTERIORS**

**LITCHFIELD FISH HOUSE RESTAURANT**

**EASY PICK-UP SHELL STATION**

**COOPER TIRES**

**LITCHFIELD RESTAURANT**

**HEALTH POINT**

**EAGLES RESORT WEAR**

**THE DIETER COMPANY**

**LITCHFIELD INN**

**CALYPSO BEACH BAR & GRILL**

**WACHOVIA**

**MCELVEEN DESIGNS**

**THE DUNES COMPANY**

**ST. PETER'S LUTHERAN CHURCH**

**CAROLINA BUILDERS**

**WACCAMAW DENTAL CLINIC**

**FIRST UNION SECURITIES**

**CAROLINA FIRST**

**HANSER HOUSE RESTAURANT**

**WAVES BEACH STORE & ICE CREAM SHOP**

**LITCHFIELD DINER**

**WEBSTER'S RESTAURANT**

**THE GOLF CENTER**

**ANTONIO'S PIZZA & SUBS**

**THE PANTRY STORE**

**TOTAL CARE DENTISTRY**

**ST. PAUL'S WACCAMAW METHODIST CHURCH**

**HAMPTON INN**

**LITCHFIELD OAKS COMMERCIAL CENTER**

**CAROLINA CUSTOM CONCEPTS**

**SETH H. GRIFFIN INSURANCE & FINANCIAL SERVICES**

**JAMES G. BENNETT - ATTORNEY AT LAW**

**SOUTHERN DESIGNS BY SHANNON MCCLURE**

**LITCHFIELD DANCE & ARTS ACADEMY (222 STUDENTS ENROLLED)**

**MIDWAY FIRE DEPARTMENT**

**THE RESERVE**

**HARBOR MARINA AT THE RESERVE**

**THE PURPLE DOOR**

**CREATIVE WINDOW TREATMENTS**

**PROFILES SALON & SPA**

**COLDWELL BANKER - LEONARD ROBERTS REAL ESTATE**

**LAW OFFICES OF PATRICK, CHANDLER & CAMPBELL**

**WACCAMAW DERMATOLOGY**

**CHRISTIAN SCIENCE SOCIETY**

**BROOKGREEN GARDENS**

**PITA ROLZ SANDWICH & ICE CREAM SHOP**

***LITCHFIELD PLAZA***

- a. DOMINOS PIZZA
- b. EGGS UP GRILL
- c. ANTONIO'S PIZZA AND SUBS
- d. MINGO MOE'S BAR AND GRILL
- e. PALM VIDEO AND GAMES
- f. SUBWAY SANDWICHES

***NORTH LITCHFIELD PROFESSIONAL PLAZA***  
**LITCHFIELD MEDICAL CENTER**

***LITCHFIELD MARKET VILLAGE***

- a. VIDEO DOT COM
- b. LOW COUNTRY VISION CARE

- c. ELITE RETREAT SALON
- d. PIGGLY WIGGLY FOOD STORE
- e. ABC LIQUOR
- f. SIMPLY DEVINE
- g. SALLY HUSS GALLERY
- h. BOOTY'S
- i. BB&T MORTGAGE
- j. TAZ
- k. MINDY MCVAY INTERIORS
- l. SEASIDE COTTAGE
- m. PLAIN AND FANCY
- n. ATKINSON INTERIORS
- o. OCEANIA TANNING
- p. B CAUZE
- q. PAC MAIL
- r. ISLAND PETS

***LITCHFIELD EXECUTIVE OFFICES***

- a. JULIAN HANNA AND ASSOCIATES
- b. PAT ASSOCIATES
- c. RIMCO INTERNATIONAL AND ASSOCIATES
- d. REBECCA MAY
- e. H. MCCROY SKIPPER AND COMPANY, CPA, PA
- f. WYNYAH CORPORATION AND LAND DEVELOPMENT
- g. BANQERS UNION CORPORATION
- h. WYNYAH CONSTRUCTION
- i. PRUDENTIAL INSURANCE-JIM PATE, AGENT
- j. CARONEL CONSTRUCTION COMPANY
- k. FIRST CHOICE REALTY
- l. ED DUBOSE, DMD FAMILY DENTISTRY
- m. EXECUTIVE TAX CONSULTANTS
- n. KING INDUSTRIES
- o. MANAGEMENT RECRUITERS OF GEORGETOWN
- p. LITCHFIELD SECRETARIAL
- q. ROGER MILL, CFP, CLU
- r. PSI
- s. GEORGE KOSKO, ATTORNEY AT LAW
- t. PENN HILL AND ASSOCIATES
- u. CROWN DENTAL STUDIO

***LITCHFIELD VILLAGE***

- a. FICO CHIROPRACTIC
- b. MAYOR'S HOUSE RESTAURANT
- c. THE PURPLE DOOR
- d. RAIN FOREST SALON AND DAY SPA
- e. FABRICS

- f. ISLAND THREADS**
- g. PALMETTO INTERIOR**
- h. PREMIER MANAGEMENT CO.**
- i. ELECTROLYSIS NAILS**

## **EXHIBIT 2**

### **Community Photographs**

# LACHICOTTE'S CORNER

REAL ESTATE

ORTHODONTIST

FLORIST

ART GALLERY



LITCHFIELD BEACH 3

MURRELLS INLET 9

PAWLEYS ISLAND 1 →



